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Mr. Chuck Jones, Administrative Planner
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Draft Environmental Impact Report for the Proposed Murrieta Valley Unifed School District New High School No. 3

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

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1. Under Short-Term (Construction) Impacts in Section 4.6.4.1 on page 4.6-6 of the Draft EIR, the lead agency states that VOC emissions are regulated by the state, cites SCAQMD Rule 1113 (Architectural Coatings) as a standard project condition in Section 4.6.3 but does not estimate project emissions from architectural coatings in the Draft EIR. VOC emissions are based not only on the VOC content of the specific coating, but also on the daily usage. If a large area is coated per day, VOC emissions from architectural coatings could cause or contribute to an exceedance of the VOC significance threshold for construction. Therefore, by not adding VOC impacts from architectural coating operations, the lead agency has substantially underestimated construction VOC emissions in the draft document and has not demonstrated that construction emissions from VOC are not significant. The lead agency should revise Tables 4.6-3 and 4.6-4 in Volume 1 on page 4.6-7 to reflect its analysis of architectural coating emission impacts in the Final EIR.

2. The SCAQMD recommends that the lead agency consider the following mitigation measure, if feasible, to reduce VOC emissions from construction activities should the lead agency's estimates of VOC emission impacts prove to be significant:

   Recommended Additions:

   1. Contractors shall use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50%.
   2. Use required coatings and solvents with a VOC content lower than required under Rule 1113.
   3. Construct/build with materials that do not require painting
   4. Use pre-painted construction materials.

3. Consistent with the SCAQMD's environmental justice enhancement I-4, in October 2003, the SCAQMD Governing Board adopted a methodology for calculating localized air quality impacts and localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. The lead agency appears to have performed an LST analysis for PM10 emissions from on-site diesel equipment. There are several problems with this analysis. First, localized NO_2 and CO impact results should have been included in the text of the EIR. Second, the PM10 analysis did not include the contribution of fugitive PM10 along with the combustion PM10. Finally, the PM10 concentration from combustion sources was compared to the state 24-hour PM10 ambient air quality standard of 50 ug/m^3. Since

the district is considered non-attainment for the state 24-hour PM10 standard, the SCAQMD recommends using 10.4 ug/m^3, developed through a public process for the

LST process. If PM10 concentrations are recalculated to include fugitive PM10, it is likely that the project would have significant localized PM10 air quality impacts. Guidance for performing a localized air quality analysis can be found at http://www.aqmd.gov/ceqa/handbook/LST/LST.html.

4. In Table 10 Summary Intersection Analysis in the Traffic Analysis in Appendix G of the Draft EIR (Existing condition to Project Buildout [Year 2009] With Project With the Improvements, the intersections listed below show a decline in the level of service in the AM Peak Hour that would warrant a CO hotspots analysis. The SCAQMD recommends performing a CO hotspots analysis if the volume to capacity ratio increases by two percent or more as a result of a proposed project for intersections rated D or worse or if the LOS declines from C to D.

   - California Oaks Road (NS) at Jackson Avenue that shows a decline in LOS during the AM peak hour from C to D;
   - Hancock Avenue (NS) intersecting at both Los Alamos Road (EW) and Murrieta Hot Springs Road (EW) both degrading from C to D;
   - Monroe Avenue (NS) at Los Alamos Road shows a decline in LOS from C to D;
   - Margarita Road (NS) at and Murrieta Hot Springs Road (EW) shows a decline in LOS from C to D;
   - Alta Murrieta Drive (NS) at Murrieta Hot Springs Road (EW shows a decline in LOS from C to D;
   - I-215 Freeway NB ramps (NS) at Los Alamos Road (EW) shows a decline in LOS from C to D; and;
   - I-215 Freeway SB ramps (NS) at Los Alamos Road (EW) shows a decline in LOS from C to D.

   Please refer to the most current Cal Trans guidance regarding performing a CO hotspots analysis. This information can be obtained at the following internet address: http://www.dot.ca.gov/hq/env/air/coprot/htm .

5. Because construction air quality impacts remain significant for NO_x after mitigation, the SCAQMD recommends the lead agency consider implementing the following mitigation measures in addition to the measures listed in pages 16 and 17 for construction to reduce applicable construction-related NOx emissions associated with the proposed project, if applicable and feasible:

   Mitigation Measures for Construction Emissions

   a. Give preferential consideration to contractors who use clean fuel construction equipment; emulsified diesel fuels; construction equipment that uses low

sulfur diesel and is equipped with oxidation catalysts, particulate traps, or other retrofit technologies, etc.

b. Prohibit truck idling in excess of five minutes.

6. Mobile source emissions during operation of the proposed project shown in Table 4.6-6 appear to be underestimated for the following reasons. The lead agency only assumed a trip length of three miles. This trip length may be reasonable for students, but the average commute trip length for the Inland Empire ranges from approximately 13.5 to 17 (Table A9-5-D, CEQA Air Quality Handbook) miles. At least some percentage of the daily vehicle trips, approximately 40 percent, would be considered commute trips (Table A9-5-C, CEQA Air Quality Handbook). Further, there are no emissions shown for buses. The lead agency, however, states on page 3-10 that 20 percent of the students will be bused. It is recommended that the lead agency revise the operational mobile source analysis to include more realistic trip length assumptions and bus emissions.